

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
(Alexandria Division)**

IN RE:

TAYLOR MADISON FRANCOIS BODINE

Debtor

LANI HAY,

Plaintiff

V.

TAYLOR MADISON FRANCOIS BODINE

Debtor

Case No. 21-11238-KHK
Chapter 7

**Adversary Proceeding
No. 21-01056-KHK**

**MOTION PURSUANT TO
LOCAL RULE 2090-1(E)(3) FOR ADMISSION *PRO HAC VICE***

Benjamin P. Smith (“Movant”), a member in good standing of the Bar of the Commonwealth of Virginia, an attorney admitted to practice before the United States Bankruptcy Court for the Eastern District of Virginia, and a shareholder with Shulman, Rogers, Gandal, Pordy & Ecker, P.A., hereby moves the Court, pursuant to this motion (the “Motion”), for the entry of an order, substantially in the form filed herewith, authorizing William B. Schroeder (“Mr. Schroeder”), an associate in the law firm of Shulman, Rogers, Gandal, Pordy & Ecker, P.A., 12505 Park Potomac Avenue, Sixth Floor, Potomac, Maryland 20854, to appear and practice *pro*

Benjamin P. Smith (VSB 90430)
William B. Schroeder (VSB 43179, *pro hac vice* pending)
Shulman, Rogers, Gandal, Pordy & Ecker, P.A.
12505 Park Potomac Avenue, Sixth Floor
Potomac, Maryland 20854
(301) 230-5200
(301) 230-5231
Counsel for Plaintiff

hac vice on behalf of Lani Hay, the Plaintiff (the “Plaintiff”), in the above-captioned Chapter 7 case now pending in the United States Bankruptcy Court for the Eastern District of Virginia and any related adversary litigation pursuant to Rule 2090-1(E)(3) of the Local Rules of the United States Bankruptcy Court for the Eastern District of Virginia (the “Local Rules”).

In support of this Motion, Movant states as follows:

1. Mr. Schroeder is admitted, practicing, and in good standing as a member of the bar of the State of Maryland, the District of Columbia and the Commonwealth of Virginia. Mr. Schroeder has also been admitted to practice before the United States District Court for the District of Maryland, the District of Columbia and the Eastern District of Virginia. There are no disciplinary proceedings pending against Mr. Schroeder.

2. Pursuant to Local Rule 2090-1(E)(3), “[a]n attorney, qualified to practice in the United States District Court of another state, the District of Columbia or a territory of the United States may appear and practice in cases *pro hac vice* before this Court upon motion of a member of the Bar of this Court, provided that in all appearance said attorney shall be accompanied by a member of this Bar. Applicants for *pro hac vice* admission shall complete a written application, which shall be appended to and incorporated by reference in the aforesaid motion.”

3. Movant requests the Court to allow Mr. Schroeder to appear at hearings in this Chapter 7 case.

4. Movant has provided notice of this Motion to all persons required to receive notice in this bankruptcy case.

5. An Application pursuant to Local Rule 2090-1(E)(3)(a) is attached hereto as Exhibit A.

WHEREFORE, the Debtor respectfully requests that the Court enter the Order granting the relief requested herein, and such other relief as the Court deems appropriate under the circumstances.

Respectfully submitted,

**SHULMAN, ROGERS, GANDAL,
PORDY & ECKER, P.A.**

By: /s/ Benjamin P. Smith
Benjamin P. Smith (VSB 90430)
William B. Schroeder (VSB 43179, *pro hac vice*
pending)
12505 Park Potomac Avenue, Sixth Floor
Potomac, Maryland 20854
TEL: (301) 230-5200
FAX: (301) 230-2891
Email: bsmith@shulmanrogers.com
wschroeder@shulmanrogers.com

Proposed Counsel for Plaintiff

CERTIFICATE OF SERVICE

The following parties received electronic notice of this filing this 1st day of October, 2021, to:

Robert Sergio Brandt	brandt@brandtlawfirm.com
John P. Fitzgerald, III	ustpreion04.ax.ecf@usdoj.gov
Steven F. Jackson	Steve.Jackson@loudoun.gov
Kevin R. McCarthy	krm@mccarthywhite.com
Stephen A. Metz	smetz@offitkurman.com

To the extent that the following persons were not served electronically via CM/ECF system, a copy of the **Motion Pursuant to Local Rule 2090-1(E)(3) for Admission *Pro Hac Vice*, Application and Proposed Order** was first class mailed, postage prepaid, this 1st day of October, 2021, to:

Treasurer, County of Loudoun, Virginia
Attention: Collections/Bankruptcy Div.
P O Box 347 (MSC #31)
Leesburg, VA. 20178-0347

Taylor Madison Francois Bodine
42779 Travelers Run Lane
Leesburg, VA 20176

/s/ Benjamin P. Smith
Benjamin P. Smith